

FILED IN CHAMBERS
U.S.D.C. Atlanta

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SEP 21 2010

JAMES N. HATTEN/Clerk
By: *[Signature]*
Deputy Clerk

ORIGINAL

UNITED STATES OF AMERICA	:	
	:	CRIMINAL INDICTMENT
v.	:	
	:	NO. 1:10-CR-134-WSD
DONALD E. FRANK	:	(Second Superseding Indictment)

THE GRAND JURY CHARGES THAT:

COUNT ONE - BRIBERY

In or about mid-September 2008, in the Northern District of Georgia, defendant, DONALD E. FRANK, then a Deputy Chief of Police with the DeKalb County Police Department, an agency which received in a one year period benefits in excess of \$10,000 under a federal program, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept something of value from Amin Budhwani, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of said Police Department involving something of value of \$5,000 or more, all in violation of Title 18, United States Code Section 666(a)(1)(B).

COUNT TWO - BRIBERY

On or about October 14, 2008, in the Northern District of Georgia, defendant, DONALD E. FRANK, then a Deputy Chief of Police with the DeKalb County Police Department, an agency which received in a one year period benefits in excess of \$10,000 under a federal program, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept something of value from Amin Budhwani, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of said Police Department involving something of value of \$5,000 or more, all in violation of Title 18, United States Code Section 666(a)(1)(B).

COUNT THREE - BRIBERY

From on or about October 20 through October 27, 2008, in the Northern District of Georgia, defendant, DONALD E. FRANK, then a Deputy Chief of Police with the DeKalb County Police Department, an agency which received in a one year period benefits in excess of \$10,000 under a federal program, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept something of value from Amin Budhwani, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of said Police Department involving

something of value of \$5,000 or more, all in violation of Title 18, United States Code Section 666(a)(1)(B).

COUNT FOUR - BRIBERY

On or about August 12, 2009 in the Northern District of Georgia, in the Northern District of Georgia, defendant, DONALD E. FRANK, then a Deputy Chief of Police with the DeKalb County Police Department, an agency which received in a one year period benefits in excess of \$10,000 under a federal program, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept something of value from Amin Budhwani, intending to be influenced and rewarded in connection with the business, transaction, and series of transactions of said Police Department involving something of value of \$5,000 or more, all in violation of Title 18, United States Code Section 666(a)(1)(B).

COUNT FIVE - BRIBERY

On or about August 20, 2009 in the Northern District of Georgia, in the Northern District of Georgia, defendant, DONALD E. FRANK, then a Deputy Chief of Police with the DeKalb County Police Department, an agency which received in a one year period benefits in excess of \$10,000 under a federal program, did corruptly solicit and demand for the benefit of any person, and accept and agree to accept something of value from Amin Budhwani, intending to be

influenced and rewarded in connection with the business, transaction, and series of transactions of said Police Department involving something of value of \$5,000 or more, all in violation of Title 18, United States Code Section 666(a)(1)(B).

A True BILL

Angel R. Almodovar
FOREPERSON

SALLY QUILLIAN YATES
UNITED STATES ATTORNEY

Susan Coppedge

SUSAN COPPEDGE
ASSISTANT UNITED STATES ATTORNEY
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